

1 THE WITNESS: Okay. I'm not a -- I'm not
2 a lawyer so I'm not sure what an interrogatory is.

3 MR. DUNCAN: They're questions.

4 JUDGE SIPPEL: Well, they're questions.
5 They're specific questions as opposed to do you
6 believe, do you admit the fact that you were in school
7 yesterday.

8 THE WITNESS: I see.

9 JUDGE SIPPEL: This is asking where were
10 you yesterday.

11 THE WITNESS: Okay.

12 JUDGE SIPPEL: But it's the same effect.
13 It's factual information that's been submitted and
14 there's a penalty for not telling the truth.

15 THE WITNESS: Understand.

16 JUDGE SIPPEL: Fair enough, Mr. Shook?

17 BY MR. SHOOK:

18 Q The interrogatory in question is
19 interrogatory number 5 and it reads as follows:
20 "Identify all persons who prepared or assisted with
21 the preparation of the supplemental ownership reports
22 for the years 1993 and 1995." And the answer in
23 pertinent part reads: "Subject to and without waiving
24 the foregoing objections or the general objections,
25 SFUSD states that for the years 1993 and 1995

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 supplemental ownership reports would have been
2 prepared by the station's General Manager with the
3 assistance of the station's Operations Manager William
4 Helgeson."

5 My question for you is are you the source
6 of that answer?

7 A I would have to say that I am not the
8 source of that answer if only because I don't recall
9 being asked to prepare any answers to this document --
10 to these interrogatories.

11 Q Fair enough.

12 JUDGE SIPPEL: Again, this is a September
13 2004 document also.

14 THE WITNESS: Yes.

15 JUDGE SIPPEL: To put it into time.

16 THE WITNESS: Thank you.

17 BY MR. SHOOK:

18 Q Now moving on to the same document
19 interrogatory number 7.

20 JUDGE SIPPEL: What page is that on?

21 MR. SHOOK: It begins on page 12.

22 BY MR. SHOOK:

23 Q Interrogatory number 7 reads: "Identify
24 all persons who prepared the quarterly issues/programs
25 lists due the 10th day after the end of each quarter

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 during the period January 1, 1991 to the present."

2 The pertinent part of the answer is: "Subject to and
3 without waiving the foregoing objections or the
4 general objections SFUSD states that the quarterly
5 issues/programs lists were created by the station's
6 General Managers identified in the response to
7 interrogatory number 3 above with the assistance of
8 William Helgeson, the station's Operations Manager.

9 SFUSD further states that those lists are
10 based in part on quarterly program descriptions
11 provided by the individual producers of local programs
12 to the station's General Manager or to William
13 Helgeson."

14 Mr. Helgeson, were you the source for that
15 response?

16 A I would have to say that I don't -- I have
17 no -- no, I have no recollection of being asked to
18 prepare that answer. So I don't -- I would have to
19 say I don't recall ever being specifically asked that
20 question in 2004 in preparing -- whoever prepared this
21 document.

22 JUDGE SIPPEL: All right. All right. I
23 think you answered it.

24 BY MR. SHOOK:

25 Q Now, Mr. Helgeson, do you recall being

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 deposed in this matter?

2 A Yes, on September -- I believe it was
3 September 28th of 2004.

4 Q Bureau Exhibit 42 --

5 JUDGE SIPPEL: Is this going to be the
6 last area that you're going to go into with this
7 witness?

8 MR. SHOOK: Your Honor, I'm getting really
9 close.

10 JUDGE SIPPEL: Oh, I don't even want to
11 chance it.

12 (Laughter).

13 JUDGE SIPPEL: Go ahead. Go right ahead.
14 What's the exhibit number?

15 MR. SHOOK: Exhibit 42.

16 BY MR. SHOOK:

17 Q And the document requests themselves or
18 the various categories appear on page 5.

19 MR. DUNCAN: Would you like to explain? I
20 think he might benefit from an explanation of what
21 this document is as well, Your Honor, or should I do
22 it?

23 JUDGE SIPPEL: You can do it.

24 MR. DUNCAN: This is the Bureau's first
25 request for production of documents from --

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 JUDGE SIPPEL: You can put it on the
2 *record. That's fine.*

3 That's all it is.

4 MR. DUNCAN: So it's just a request that
5 documents be produced by the SFUSD.

6 BY MR. SHOOK:

7 Q And dated -- I mean, let's put this in
8 context.

9 MR. DUNCAN: The date on the document is
10 September 14, 2004.

11 THE WITNESS: Okay.

12 BY MR. SHOOK:

13 Q All right. Now, you don't really have to
14 focus on anything in particular. I just wanted you to
15 be aware of context of what I'm going to ask you that
16 this document was sent to SFUSD and its counsel on
17 September 14 of 2004.

18 Bureau Exhibit 43 is San Francisco Unified
19 School District's objections and responses to
20 Enforcement Bureau's first request for production of
21 documents. And at page 3 of Exhibit 43 it states in
22 pertinent part to request number 1, which number 1 was
23 all ownership reports that were in the station public
24 inspection file on August 1, 1997. The pertinent part
25 of the response reads: "Subject to and without

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 waiving the foregoing objections or the general
2 objections SFUSD states that upon information and
3 belief ownership reports for 1991 and 1997 were in the
4 public inspection file on or about August 1, 1997.

5 The 1991 report can be located on the CD
6 produced by SFUSD to the Bureau and is denominated
7 KALW 003575-3577. The 1997 ownership report was
8 attached to SFUSD's renewal application and is already
9 in the Bureau's possession.

10 SFUSD further states that it lacks
11 information sufficient to state whether other
12 ownership reports were in the public inspection file
13 at that time."

14 MR. DUNCAN: Your Honor, I believe Mr.
15 Shook was reading from Exhibit 43.

16 JUDGE SIPPEL: Forty-three. Yes, he is.

17 MR. DUNCAN: And the response I had put
18 the question -- I think we were told to go to 42. So
19 I had 42 in front of him. Here is 43, which is the
20 response to his request.

21 JUDGE SIPPEL: I see actually where you're
22 going on this, Mr. Duncan. You're absolutely right.

23 BY MR. SHOOK:

24 Q In any event, Mr. Helgeson, my question is
25 for the response that was given to the Bureau's

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 request did any of that information come from you?

2 A I don't recall providing any -- any of
3 that information -- any of that answer to whoever
4 drafted these answers.

5 Q At least with respect to the ownership
6 reports? I mean this is only focusing on the
7 ownership reports right now.

8 A Yes. Sure. Yes. You mentioned -- it
9 mentioned something about the CD -- contained in the
10 CD.

11 Q Right.

12 A Right. Yes.

13 JUDGE SIPPEL: Listen to, let me give you
14 the effect of it. I don't want to cut you off, your
15 answer. But this is saying that the 1991 report is
16 located on the CD. Okay. 1997 report was attached to
17 SFUSD's renewal application. And they already have
18 that. So in effect the answer is saying you can look
19 for the '91 material on the CD and you already have
20 the '97. Is that basically what it's saying?

21 MR. SHOOK: And then there's the final
22 sentence.

23 JUDGE SIPPEL: And the final sentence
24 which says "SFUSD further states that it lacks
25 information sufficient to state whether other

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 ownership reports were in the public inspection file
2 at that time." And that being what?

3 MR. SHOOK: The August 1, 1997.

4 JUDGE SIPPEL: All right.

5 MR. SHOOK: Okay.

6 THE WITNESS: So again the question is did
7 I provide that information?

8 JUDGE SIPPEL: Any of that information?

9 THE WITNESS: I don't recall providing any
10 of that information in 2004.

11 JUDGE SIPPEL: Now I say "providing" I
12 think when we talk about providing we mean giving it
13 to the lawyers who were preparing the document, the
14 attorneys who were working on this.

15 THE WITNESS: I don't recall giving that
16 to the attorneys in 2004.

17 JUDGE SIPPEL: Well, let me ask the
18 question again, as I did with the other, this was a
19 request for documents.

20 THE WITNESS: Yes. Yes.

21 JUDGE SIPPEL: This is different from the
22 request for admissions.

23 THE WITNESS: Right.

24 JUDGE SIPPEL: Different from the request
25 for answers to interrogatories. This is asking

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 whether you have these documents, and if you do have
2 them, we want them. That's in effect what they're
3 saying, okay?

4 THE WITNESS: Okay.

5 JUDGE SIPPEL: Did you help the attorneys
6 in anyway preparing for a document request in 2004,
7 September 2004?

8 THE WITNESS: In September -- I don't
9 recall providing them with any documents.

10 JUDGE SIPPEL: And you would recall that,
11 wouldn't you? That's not that long ago.

12 THE WITNESS: It's -- no, I would recall
13 that. And given my -- I would say in that time, even
14 my eyesight I wouldn't -- asking me to find documents
15 wouldn't be -- wouldn't be a terrific idea anyway.

16 JUDGE SIPPEL: I admit I've taken this
17 question further than I should have.

18 (Laughter).

19 JUDGE SIPPEL: Your logic is inescapable.

20 (Laughter).

21 JUDGE SIPPEL: I'm sorry. I don't-- I
22 don't -- you know, let's move on.

23 BY MR. SHOOK:

24 Q All right. Now I want to focus on request
25 number 3, and request number 3 --

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 JUDGE SIPPEL: We're on the same document
2 then?

3 MR. SHOOK: Yes. EB Exhibit 43.

4 BY MR. SHOOK:

5 Q Request number 3, which appears on page 4,
6 and it reads as follows: "All issues/programs lists
7 that were in the station public inspection file on
8 August 1, 1997." And the pertinent part of the answer
9 reads as follows: "Subject to and without waiving the
10 foregoing objections or the general objections, SFUSD
11 states that upon information and belief on or about
12 August 1, 1997 the station's public inspection file
13 contained issues/programs lists for the period from
14 January 1, 1992 until the second quarter of 1997 (the
15 last quarter before the 1997 renewal application was
16 filed) with the exception of the document entitled
17 City Visions Quarterly Issues/Programs List 1992 to
18 1997, CEGKALW 000107, which upon information and
19 belief SFUSD believes was generated and placed in the
20 files after August 1, 1997. Those documents can be
21 located on the CD produced for SFUSD to the Bureau and
22 are denominated KALW0001 through 1008.

23 SFUSD further states that it lacks
24 information sufficient to state whether other
25 documents constituting issues/programs lists were in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the public inspection file on August 1, 1997, but
2 states that some additional documents likely were in
3 the public inspection file at that time. SFUSD basis
4 this belief on the fact that GGPR attached one such
5 document as Attachment 0 to its Petition to Deny the
6 Application, but that no such document is now present
7 in the KALW public inspection file."

8 So my question for you is were you the
9 source of any of the information that I just read?

10 A I don't recall being the source of any of
11 that information in 2004.

12 Q The next area I'd like to focus on is EB
13 Exhibit 43. It's request number 5. And that request
14 reads -- it appears on page 5. That request reads as
15 follows: "All documents relied upon by Ramirez in
16 determining and certifying to the accuracy of the yes
17 answer given by SFUSD to application item 2 at page 3
18 which reads: 'Has the applicant placed in its public
19 inspection file at the appropriate the times the
20 documentation required by 47 CFR §73.3526 and
21 §73.3527.' "

22 In penitent part the response states --
23 and I have to locate it. "Subject to and without
24 waiving the foregoing objections or the general
25 objections SFUSD states that upon information and

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 belief that Mr. Ramirez would have considered the
2 issues/programs lists in ownership reports from the
3 station's public inspection file in connection with
4 answering item 2 at page 3 of SFUSD's application."

5 Were you the source for that response?

6 A I wasn't -- I have no recollection of
7 being the source for that response.

8 Q Do you have any knowledge as to who the
9 source for that response was?

10 A I don't have any specific knowledge of who
11 it would have been -- who it was.

12 Q And I want to direct your attention to EB
13 Exhibit 50.

14 JUDGE SIPPEL: Okay. We can tell him what
15 it is, right?

16 MR. SHOOK: Right.

17 JUDGE SIPPEL: Is this a memo or is this
18 an email?

19 THE WITNESS: Looks like an email. I
20 hadn't seen -- I don't -- I want to --

21 MR. SHOOK: Looks like an email.

22 JUDGE SIPPEL: Looks like an email. From
23 you to Ms. Wright.

24 JUDGE SIPPEL: Jackie Wright.

25 THE WITNESS: To Jackie. Okay.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 JUDGE SIPPEL: And it's regarding the
2 legal costs of the license challenge. Jackie Wright,
3 that would be Jackie Wright.

4 THE WITNESS: Right.

5 JUDGE SIPPEL: Do you have a specific line
6 or paragraph you want to direct him to or is this
7 going to be a general question.

8 MR. SHOOK: No, first general and then --

9 THE WITNESS: Okay.

10 BY MR. SHOOK:

11 Q Now, are you the author of this email?

12 A Yes, I am the author of this email.

13 Q And as reflected in the email, did you
14 review Sanchez law firm invoices to determine what the
15 Golden Gate Public Radio challenge had cost SFUSD up
16 to June of 2001?

17 A I did do that at the request of, I believe
18 it was Jackie Wright.

19 Q And now what exactly did you look at?

20 A What I looked at were -- I collected from
21 the time of the challenge up to the date of this
22 request all the Sanchez invoices that they had
23 received at the station from my file. And in
24 reviewing them, tried to call out what charges -- but
25 what amounts the Sanchez law firm had billed KALW --

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 KALW and SFUSD in their work regarding the GGPR
2 challenge to the license.

3 Q Are these invoices that SFUSD still
4 maintains? Maybe I should back up.

5 A Okay.

6 Q How did you obtain the invoices that you
7 reviewed?

8 A I went to the station's files and my
9 private files where I keep information about invoices.
10 And I was able to go back over those periods of time
11 and collect the invoice -- my copies that I had kept
12 at the station of Sanchez invoices. And I reviewed the
13 line items that I saw them.

14 Q So this is now June 2001 and you had
15 maintained copies of invoices dating back to 1997?

16 A Yes, that's correct.

17 Q And is this something that you have
18 continued to do since, you've continued to maintain a
19 file of Sanchez law firm invoices?

20 A I tried to maintain at the station copies
21 of all invoices that the station pays, including those
22 of Sanchez law firm.

23 Q Currently to your knowledge how far back
24 does the station have a record of Sanchez law firm
25 invoices?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 A I -- I -- at this point I'd have to
2 estimate without actually reviewing the file, but I
3 would say mid-'90s. At the time I was preparing I was
4 preparing this document, I certainly was able to find
5 them as far back as the period of 1997.

6 Without -- with the caveat that I -- I'd
7 like to review it, I couldn't give you an exact date
8 as far back they go.

9 Q According to the email the invoices
10 reflected by June of 2001 that \$83,914 had been paid
11 by the District, as it is said here, to defend itself
12 from GGPR.

13 Now, you've been questioned repeatedly
14 about various aspects of EB Exhibit 7, which were slip
15 listings from the Sanchez law firm and EB Exhibit 35,
16 which reflect other bills from the Sanchez law firm.
17 Do you recall that?

18 A That you've -- that you've questioned me
19 about those?

20 A Yes.

21 Q I would yes -- yes.

22 Q Now, looking at EB Exhibit 7 focusing on
23 page 11 there's a total for a bill that reflects a
24 figure of \$37,785.12.

25 JUDGE SIPPEL: That's under the heading of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 "Grand Total"?

2 MR. SHOOK: Yes.

3 JUDGE SIPPEL: So why don't you go to the
4 grand total, which is usually at the end?

5 MR. DUNCAN: I guess I object. Having
6 looked at it, I guess I object to the characterization
7 of what appears at the bottom of that last page. I
8 believe he referred to this as "a bill."

9 JUDGE SIPPEL: Okay.

10 MR. DUNCAN: And I don't know that that's--

11 MR. SHOOK: No, it's not a bill. It's
12 slip listings. I don't know what this is.

13 JUDGE SIPPEL: That's all right. We've
14 been on this Exhibit enough that we know what we're
15 talking about. These are not bills, these are slip
16 listings.

17 BY MR. SHOOK:

18 Q In any event, I just wanted to direct your
19 attention to the fact that the final figure that
20 appears on page 11 is \$37,785.12. And then when you go
21 to EB Exhibit 35 there's also a figure that appears at
22 the end of the Exhibit at page 3, and that figure
23 appears as \$15,222.02.

24 Now, not that I'm a math genius, but
25 adding those two figures together I come up with close

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 to \$53,000. Do you have any explanation for why there
2 *appears to be such a disparity between your analysis*
3 of what the Sanchez law firm billed and what we're
4 seeing here? The sum of the two figures appears to be
5 almost \$30,000 less?

6 A Well, at this -- at this time all I could
7 -- I mean, I don't recall specific -- you know, when
8 I was putting the -- I reviewing the bills in June of
9 2001 for Jackie Wright I don't at this point -- you
10 know, I'd have to -- it's been four years since I
11 looked at those bills and came up with that figure,
12 however I came up with it. And I -- that's -- so I --
13 the slip listings were something -- were not something
14 that I went -- was the basis for my -- I never
15 received slip listings from Mr. Sanchez. So I'm not
16 sure about the information contained -- as far as that
17 -- this -- this hearing is the first time I've seen
18 slip listings.

19 When Mr. Sanchez -- when I would get
20 invoices for -- from Mr. Sanchez, they came in this
21 form here.

22 JUDGE SIPPEL: Now "here" --

23 THE WITNESS: So I can't really -- I can't
24 really explain at this point.

25 JUDGE SIPPEL: When you held up the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 document, what is this form here? Hold on just a
2 second. Let counsel straighten it up.

3 MR. DUNCAN: This is EB 35. The "this"
4 that he held up is EB 35.

5 JUDGE SIPPEL: All right.

6 MR. DUNCAN: At this point I'd have to--

7 JUDGE SIPPEL: Let's see if he needs
8 anymore information.

9 MR. SHOOK: I do not.

10 JUDGE SIPPEL: Okay.

11 MR. SHOOK: In fact, I'm finished.

12 JUDGE SIPPEL: There you go. There you
13 go.

14 Mr. Duncan, you ready to go?

15 MR. DUNCAN: I'd like a couple of minutes,
16 Your Honor. And since it's lunchtime, would that work?

17 JUDGE SIPPEL: That would work. Let me go
18 off the record.

19 (Whereupon, at 11:58 a.m. off the record
20 until 11:59 a.m.)

21 JUDGE SIPPEL: The Bureau has completed
22 its cross. It's 12:00. We will be back at ten minutes
23 after 1:00.

24 Thank you very much.

25 (Whereupon, at 12:00 noon the hearing was

1 adjourned, to reconvene this same day at 1:08 p.m.)

2 JUDGE SIPPEL: Okay. We're on the record.
3 The witness is on the stand. It's time for redirect.
4 Mr. Duncan?

5 MR. DUNCAN: Thank you, Your Honor.

6 REDIRECT EXAMINATION

7 BY MR. DUNCAN:

8 Q Mr. Helgeson, I'm going to start by taking
9 you back here a couple of days. We've spent a couple
10 of days now going through, more or less, a
11 chronological recitation of your involvement with the
12 station with respect to these issues. And I want to
13 just take you back to the beginning and just try to
14 make sure that we've nailed down a couple of things as
15 we go through.

16 I understood that you testified that the
17 first time you sort of worked at KALW was as a
18 volunteer, is that right?

19 A That's right. That was in the late '80s
20 was -- KALW was only -- I was a listener to KALW and
21 that's how I got started getting involved with the
22 station was as a listener. And the station was only
23 a few blocks from where I lived at the time. And I
24 called up one day and asked if I could volunteer. And
25 told him I was a listener. And they said come on in.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 And I started coming in, I would say, one -- one day
2 one afternoon a week or something, maybe two
3 afternoons a week. And start doing some just general
4 office clerical things that they had -- they had, that
5 they could give me.

6 Q Okay. And during the time you were
7 volunteering there were you also working at any other
8 jobs for pay?

9 A Yes. I had -- I had just finished,
10 actually. I was just finishing up around that time
11 working for a small computer company that was in San
12 Francisco. And their computer business didn't go too
13 well. I was working in more of an administrative
14 position at that -- at that firm. It was small. And
15 they did some -- there were some staff cuts there due
16 to -- due to the economy and so on. And I had left
17 after about two years.

18 And then I was working for a person, a
19 friend of mine that started a company, an event
20 production company that put on, you know, corporate --
21 corporate parties, weddings and so on. And I assisted
22 her in on working on particular events. So it wasn't,
23 say, a five day a week Monday through Friday type of
24 job. So I had some time available. And part of the
25 time I used to fill that time up with was doing some

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 volunteer work. And KALW was one of the places I did
2 it.

3 Q Had you ever had a job prior to coming to
4 KALW that you had been at for, you know, longer than
5 a few years?

6 A After getting out of college I didn't have
7 anything specifically lined up as far as a job. And
8 at that point my stepfather had a bar in San
9 Francisco. And he was getting ready to retire. And we
10 talked it over, and at right -- at soon of getting out
11 of college I took over operation of the bar in San
12 Francisco. And ran the bar for -- for about four or
13 five years.

14 And at that time it was a good way to make
15 money. And I enjoyed it. And did it until 19 -- early
16 1980/'81.

17 And then I got -- and at one point the
18 lease on the bar came up and the new owner of the
19 building decided he -- he wanted to get into the bar
20 business himself. And so he didn't offer me a new
21 lease, and that was my release from the bar business
22 at the time.

23 Q And what, if any, radio or media
24 experience did you have before you started
25 volunteering at KALW?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 A When I walked in the door at KALW the late
2 '80s, I was -- as far as I recall the first time I was
3 ever in a radio or a TV station in my life. I'd never
4 been in one before. So it was all -- KALW was the
5 only station I've ever worked at. And so up until
6 them it was all -- it was all new to me when I saw
7 KALW.

8 Q Did you have any prior radio/media
9 educational background?

10 A No, I didn't up to that point. I'd gone --
11 gotten a college degree, but nothing related to
12 broadcasting or media in anyway at all. So, not even
13 nonelectric -- nonelectronic journalism.

14 Q Had you had any prior experience with
15 complying with governmental regulations or
16 requirements?

17 A No, sir. At that point I guess looking
18 back on it, in the previous jobs I can only recall --
19 you know, when I -- there was -- there was -- when you
20 own a bar you have to have a liquor license. And
21 perhaps I -- that came with the bar already, so I had
22 to maintain that as a license. But that's the only
23 kind of government license that I was maintaining up
24 to that point that I can recall before I came here --
25 up to that time.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Q Okay. And your first full time job, paid
2 job, I guess, at KALW was as a clerk/typist, is that
3 right?

4 A It was the Civil Service classification
5 was called clerk/typist. And basically it was a
6 general -- it was the kind of position that they
7 offered people who were doing general office work,
8 things like filing, typing. It was a typing position,
9 although even at that time I was doing very little
10 typing. At least at KALW I didn't do too much typing
11 at that point, that I can recall. It was answering the
12 phone. People called in, wanted to have information
13 about programs, you'd answer that kind of a question.
14 That was the kind of thing. It was envelop stuffing
15 to do, opening up mail when it came in, putting things
16 away whatever needed to be put away. That was, as I
17 recall, the kind of general duties that I was involved
18 with at that time.

19 Q In what ways did your duties at KALW
20 change over time?

21 A From the time -- in the late '80, after I
22 stopped being -- I -- at one point I had stopped being
23 a volunteer. They offered me -- they wanted to have
24 somebody there approximately two days a week. They
25 wanted to add an administrative type clerk position.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 And so they added me in as this clerk/typist position,
2 which was -- it started as about two days a week and
3 over time became three and four. As -- as I started
4 learning more things to do, I got around the office.
5 And they needed somebody else. And so over time it
6 included all those things that I was doing, sort of
7 answering the phone and filing and typing maybe two
8 days a week, I started doing it three and four days a
9 week.

10 Over time I started taking on some of the
11 activities regarding listener donations. We got a lot
12 of -- the vast majority of the funds to run KALW have
13 always come from the listeners, at least while I was
14 there. And so there was quite a bit involved with
15 counting up the checks that came in, taking care of
16 credit card donations, which at that time were all
17 done manually on a typewriter not electronically like
18 they are now.

19 And often and over time if people made a
20 donation of a certain amount, we would send them a
21 coffee mug. So there was mail going out in that sense.
22 There was mail going -- maybe over time there was
23 preparing the mailings to determine who -- who we were
24 going to send money requests for donations to. And
25 preparing those mailings. Maybe going to the printer.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Over time starting to collect information
2 about radio programs. That information would be
3 prepared for the Program Guide.

4 It was like a general -- on a gentle
5 gradually over time more and more duties came on.

6 Q And at some point you were then given the
7 title of Operations Manager, is that right?

8 A Yes. In early '90s Jerry Jacob saw that I
9 was doing actually quite a bit more than just being --
10 doing the duties of what at that time was a
11 clerk/typist. And he offered -- he felt it was more
12 of a managerial positions given the kind of duties and
13 responsibilities I had and that he was giving me. So
14 it was involving things such as doing the -- taking
15 care of the payroll of the station on a biweekly
16 basis, scheduling announcers for the station when we
17 needed announcers, being involved in making some
18 purchases when purchases needed to be made. Taking
19 care of some of the billing for invoices and financial
20 -- financial matters. And, again, taking on -- you
21 know, as time went on, preparing more of the copy for
22 the Program Guide and making sure that that was taken
23 care of promptly. Those were the kind of things that
24 I started doing on a more regular basis. And he felt
25 that senior clerk/typist or clerk/typist position

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701